

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

RIVER CITY MEDIA, LLC, et al.,) Case No.: 2:17-cv-00105-SAB
)
Plaintiffs,) DECLARATION OF JEREMY
vs.) BARTELS IN SUPPORT OF MOTION
) FOR LEAVE TO WITHDRAW AS
KROMTECH ALLIANCE) COUNSEL
CORPORATION, et al.,)
)
Defendants.)

I, Jeremy Bartels, state and declare as follows:

1. I am an attorney for Rocke Law Group, PLLC representing Defendant Chris Vickery in this case. I am over the age of 18 and otherwise competent to testify.

2. Defendant Vickery has instructed our firm that we are no longer authorized to represent him.

3. Attached as **Exhibit 1** is Chung, Malhas, & Mantel, PLLC's Notice of Limited Appearance on behalf of Defendant Vickery.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed and DATED this 10th day of January, 2018, in Seattle, Washington.


Jeremy Bartels

DECLARATION OF JEREMY
BARTELS – Page 1
Case No. 2:17-cv-00105-SAB

ROCKE | LAW Group, PLLC
101 Yesler Way, Suite 603
Seattle, WA 98104
(206) 652-8670

Exhibit 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF WASHINGTON (SPOKANE)**

River City Media, LLC., a Wyoming limited liability company, MARK FERRIS, an individual, MATT Ferris, an individual, and AMBER PAUL, an individual,

Plaintiffs,

v.

KROMTECH ALLIANCE CORPORATION, a German corporation, CHRIS VICKERY, an individual, CXO MEDIA, INC., a Massachusetts corporation, INTERNATIONAL DATA GROUP INC., a Massachusetts corporation, and STEVE RAGAN, an individual, and DOES 1-50,

Defendants.

NO.: 2:17-CV-00105-SAB

**LIMITED NOTICE OF APPEARANCE
OF COUNSEL ON BEHALF OF
DEFENDANT CHRIS VICKERY**

TO: The United State District Court Clerk for the Eastern District of Washington; and
TO: Leeor Neta, Jason E. Bernstein, Counsels for Plaintiffs.

COMES NOW, Edward C. Chung, with the law firm of Chung, Malhas & Mantel, PLLC, and enters its Limited Notice of Appearance on behalf of Defendant Chris Vickery, and without waiving the defenses of:



- 1 1. Lack of jurisdiction over the subject matter;
- 2 2. Lack of jurisdiction over the person;
- 3 3. Improper venue;
- 4 4. Insufficiency of process;
- 5 5. Insufficiency of service of process;
- 6 6. Failure to state a claim upon which relief can be granted

7
8
9 **YOU ARE FURTHER NOTIFIED** that all future pleadings or papers, exclusive of original process, are
10 to be served with the Clerk of the Court using ECF system, which will send notification of such filing to
11 the attorney of record for the Defendant to:
12
13

14 Edward C. Chung, Esq.
15 CHUNG, MALHAS & MANTEL, PLLC
16 1511 Third Avenue, Suite #1088
17 Seattle, Washington 98101
18 Echung@cmmlawfirm.com; and
19 Litigation@cmmlawfirm.com

20 *Respectfully submitted this 5th of January 2018.*

21 /s/ Edward C. Chung
22 Edward C. Chung, WSBA # 34292
23 Attorney for Defendant, Chris Vickery
24
25
26
27
28
29
30
31
32



DECLARATION OF SERVICE

I, Ruth Vizcaino, declare under penalty of perjury under the laws of the State of Washington that I am an associate with the law firm of CHUNG, MALHAS & MANTEL, PLLC with an address of 1511 Third Avenue, Suite 1088, Seattle, Washington 98101; and I caused copies of **LIMITED NOTICE OF APPEARANCE OF COUNSEL ON BEHALF OF DEFENDANT CHRIS VICKERY** to be served as follows:

Leeor Neta		Legal Messenger
Newman Du Wors LLP	X	E-Service
600 California Street, Floor 11	X	Electronic Mail
San Francisco, CA 94109		Facsimile
leeor@newmanlaw.com		First Class Mail
 Jason Eric Bernstein		 Legal Messenger
Newman Du Wors LLP	X	E-Service
2101 Fourth Avenue	X	Electronic Mail
Suite 1500		Facsimile
Seattle, WA 98121		First Class Mail
jake@newmanlaw.com		

Respectfully submitted this 5th of January 2018.

/s/ Ruth Vizcaino
Ruth Vizcaino, Associate

